

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN (HATTIESBURG) DIVISION**

**JACOB GALLOWAY**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO. 2:19CV76-KS-MTP**

**SANDERSON FARMS, INC.**

**DEFENDANT**

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**SANDERSON FARMS, INC.’S MOTION FOR SUMMARY JUDGMENT OR,  
ALTERNATIVELY, FOR PARTIAL SUMMARY JUDGMENT**

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Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant Sanderson Farms, Inc. (“Sanderson Farms” or “Defendant”), by and through its undersigned counsel, respectfully moves the Court to enter Summary Judgment in its favor. This motion is supported by Sanderson Farms’ Memorandum of Law in Support of Motion for Summary Judgment or, Alternatively, for Partial Summary Judgment, which is being served upon opposing counsel and the Court contemporaneously with the filing of this Motion, the pleadings on file in this matter and other such material which may come before the Court on the hearing of this matter. The Motion is further supported by the following exhibits, which are attached hereto and incorporated into Defendant’s Memorandum:

Affidavit of Zane Lambert [Exhibit A];

Deposition of Jacob Galloway [Exhibit B];

Affidavit of Brenda Gatlin [Exhibit C];

Affidavit of Bryon Kittler [Exhibit D];

Affidavit of Kevin Blair [Exhibit E];

Affidavit of Holly Dorsey McCallum [Exhibit F];

Affidavit of Ken Loftin [Exhibit G];

Flight Safety International Invoice [Exhibit H];

Deposition of Brenda Gatlin [Exhibit I];

Deposition of Bryon Kittler [Exhibit J]; and

Deposition of Zane Lambert [Exhibit K]

Dated this the 15th day of April, 2020.

**SANDERSON FARMS, INC.**

By: /s/ Stephen J. Carmody  
One of Its Attorneys

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have electronically filed the foregoing with the Clerk of this Court using the ECF system, which sent notification of such filing to all registered users.

Dated: April 15, 2020.

s/ Stephen J. Carmody

Stephen J. Carmody